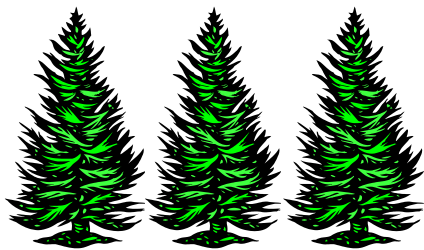


US EPA ARCHIVE DOCUMENT



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November 27, 2017

U. S. Environmental Protection Agency
Region 5/PCB Coordinator
Ralph Metcalfe Federal Building
77 West Jackson Blvd.
Chicago, IL 60604-3590

Attn: Ms. Mary Setnicar, Chief RCRA/TSCA Programs Section

RE: Response to EPA'S Comments in letter dated 10/25/17

Dear Ms. Setnicar:

On behalf of Trans-Cycle Industries of Ohio, LLC (TCI), attached to this letter is the response to EPA's comments to the letter referenced above. Additionally, the following documents are also included:

- TCI OH Commercial Storer Application Revised 11/18/17
- TCI OH Closure Plan Revised 11/18/17
- TCI OH Contingency Plan Draft
- TCI OH Health & Safety Plan
- TCI OH SOP "Receiving and Accepting Shipments for Processing and Storage"
- TCI OH SOP "Sampling and Wipe Testing"

I trust that the enclosed information is complete and addresses your issues. If you should have any questions, please do not hesitate to contact me by email or by phone (478-232-4831).

With kind regards,

Cynthia M. Orms

President

cc: Frank Jackson, President, TCI OH
George Jackson, President, TCI AL

RESPONSE TO EPA'S LETTER DATED 10/25/17

Comments on Commercial Storage Application

1. Include the EPA Identification Number in the revised application.

The EPA Identification Number has been added to the Commercial Storer Application and the Closure Plan.

2. Provide an introduction that gives an overview of the operations at the facility. Include copies of any standard operating procedures (SOP) that describe TCI's procedures for transformer acceptance and processing including sampling and analysis of transformer oil. Include procedures for tracking the date of removal from service for disposal, laboratories to be used, and procedures for draining PCB oil, if applicable.

Standard Operating Procedures have been added in Section XII detailing the above procedures and processes.

3. Describe TCI's inspection procedures of the PCB Items in the PCB storage area at the Richwood, Ohio facility. Alternatively, TCI may include mly inspection forms or SOPs for inspection procedures as attachments if TCI has these available. See§ 761.65(c)(5).

A copy of the PCB Storage Area Inspection form is attached as part of the Standard Operating Procedure titled "Receiving & Accepting Shipments for Processing and Storage." (Section XII)

4. Describe the location of any sewers on or adjacent to the facility property. Also, describe the surface water runoff flow pattern. Alternatively, a map can be submitted that depicts this information.

A Property Drain map is attached in Section XI along with a description of the surface water runoff flow pattern. The map has been added as Figure 5 in the Closure Plan.

5. Provide a copy of the Contingency Plan and the Health and Safety Plan for the facility. In addition, provide copies of any other emergency response or spill cleanup procedures that TCI will use at the facility.

- The Draft Contingency Plan is included in Section XIII.
- The Health & Safety Plan is included in Section XIV.
- TCI will operate at all times in accordance with the PCB Spill Cleanup Policy at 40 CFR 761, Subpart G.

6. Does Trans-Cycle Industries of Ohio, LLC have a parent company? If so, what is the name of the parent company? If available, please submit a corporate structure diagram.

Trans-Cycle Industries of Ohio, LLC (TCI) does not have a parent company. The list of all affiliated companies was provided in the Commercial Storer Application - Section V. The owners

of the company with their respective titles were provided in the application at Section I. As TCI is a limited liability company not a corporation, it does not have a typical corporate structure; instead it has a President and members.

7. Section II - Operations & Management of Facility Organizational Chart: Clarify if Frank Jackson will be at the Richwood, Ohio facility supervising operations when it opens. If not, provide information on this person when available.

Frank Jackson, as President, will be the individual at the Richwood facility responsible for overall operations and management of the facility.

8. Section VI - Estimate of Maximum PCB Waste Quantities to be Handled by the Facility: Clarify if all the PCBs and PCB Items listed in the table are to be stored in Area I. This needs to be made clear in this section.

All PCB items received at the facility will be stored in Area I. Please note that the majority of items received as regulated PCB will actually be assumed PCB. Upon receipt at the facility, the items will be tested. Based on historical data, ~90% of those items will test < 50 ppm PCBs and be re-classified. All items re-classified as < 50 ppm PCBs will be removed from Area I and stored and processed in Area II. All manifests will be corrected accordingly and appended with the associated analytical data. Section VI has been revised to clarify this process.

9. Section VI - Estimate of Maximum PCB Waste Quantities to be Handled by the Facility: Clarify what the 80,000 pounds of solids and debris will consist of.

The 80,000 lbs will consist of the following:

- Drums and/or totes of PCB solid waste and debris generated through draining, removal, and clean-up activities at Generator's and/or TCI's site.
 - No PCB Articles will be included in this material.

10. Section IX - Closure Cost Estimate: Include the following in the Closure Cost Estimate:
- a. rental costs for heavy equipment;
 - b. fuel for the heavy equipment; and
 - c. container costs for detergent/water from cleanup.

The Closure Cost Estimates in the Commercial Storer application and the Closure Plan have been revised to reflect the additional items as requested.

11. Section X - Financial Responsibility: Include the type of financial instrument that TCI intends to use for financial assurance.

Section X has been revised to reflect that a Letter of Credit will be used for the funding instrument.

Comments on Closure Plan

12. **Section 1.1 – Introduction:** This section states that the "Director of the Office of Resource Recovery and Conservation will be notified at least 30 days prior to the date TCI expects to begin

final closure." Change "Director of the Office of Resource Recovery and Conservation" to "EPA Regional Administrator." Also, change "30 days" to "60 days." See§ 761.65(e)(6)(i).

Section 1.1 has been revised accordingly.

13. **Section 1. - Final Closure Activities:** This section states cleanup levels for both high-occupancy areas and low-occupancy areas. Clarify in this section which cleanup level is to be used. Note that if the low-occupancy cleanup standard is used, then a deed restriction will likely be required.

Section 1 has been revised to reflect the correct cleanup standard.

14. **Section 3.1 - Facility Layout and Description:** In accordance with§ 761.65(b)(1)(iii), confirm that the PCB storage area does not contain drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area.

Section 3.1 has been revised.

15. **Section 3.3 - Bulk Storage Tanks.** Provide clarification in Section 3.3 as to what material the bulk storage tanks will contain.

Section 3.3 has been revised.